

**COMMONWEALTH OF MASSACHUSETTS
US DISTRICT COURT**

SECURITIES AND EXCHANGE COMMISSION, PLAINTIFF

**JAMES M MERRILL, CARLOS N WANZELER, STEVEN M LABRIOLA, JOSEPH H CRAFT,
SANDERLEY RODRIGUES DE VASCONCELOS, SANTIAGO DE LA ROSA, RANDY N
CROSBY AND FAITH R SLOAN**

AND

TELEXFREE, INC AND TELEXFREE, LLC, DEFENDANT(S)

RBS CITIZENS, NA, TRUSTEE

CASE NO: 14-11858-DJC

ANSWER OF TRUSTEE

**RBS CITIZENS, NA, 525 WILLIAM PENN PLACE, PITTSBURGH, PA, SUMMONED AS
TRUSTEE FOR THE DEFENDANT, MAKES AN ANSWER THAT AT THE TIME OF ORIGINAL
SERVICE OF THE SUMMONS UPON TRUSTEE IT HAD IN ITS POSSESSION GOODS,
EFFECTS AND CREDITS IN THE AMOUNTS AS FOLLOWS:**

<u>TITLE</u>	<u>ACCT. TYPE / NUMBER</u>	<u>AMOUNT HELD</u>
JAMES M MERRILL	NONE	\$ 0.00
CARLOS N WANZELER	NONE	\$ 0.00
STEVEN M LABRIOLA	NONE	\$ 0.00
JOSEPH H CRAFT	NONE	\$ 0.00
SANDERLEY RODRIGUES		
DE VASCONCELOS	NONE	\$ 0.00
SANTIAGO DE LA ROSA	NONE	\$ 0.00
RANDY N CROSBY	NONE	\$ 0.00
FAITH R SLOAN	NONE	\$ 0.00
TELEXFREE, INC	NONE	\$ 0.00
TELEXFREE, LLC	NONE	\$ 0.00

TOTAL AMOUNT HELD: \$ 0.00

CASE NO: 14-11858-DJC

ON BEHALF OF RBS CITIZENS, NA I HAVE PREPARED THE FOREGOING ANSWER WITH THE ASSISTANCE OF AGENTS, EMPLOYEES AND REPRESENTATIVES OF THE BANK WHO ORDINARILY WORK ON SUCH RECORDS MATTERS AND ARE BELIEVED TO HAVE RELEVANT AND CORRECT INFORMATION AND RECORDS UPON WHICH THIS AMENDED ANSWER IS BASED. ACCORDINGLY SUCH ANSWER, AS SET FORTH HEREIN, IS TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

SIGNED UNDER OATH THIS 7TH DAY OF MAY, 2014

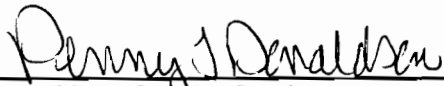
RBS CITIZENS BANK, N.A.

BY: Penny J Donaldson
PENNY J DONALDSON
OPERATIONS CLERK
PHONE: 888-999-6884

CERTIFICATION

I HEREBY CERTIFY THAT ON MAY 7, 2014, I MAILED A COPY OF THE WITHIN ANSWER TO THE PLAINTIFF'S ATTORNEY.

FRANK HUNTINGTON, SENIOR TRIAL COUNSEL
BOSTON REGIONAL OFFICE
33 ARCH ST., 23RD FL
BOSTON MA 02110-1424


Penny J Donaldson
Penny J DONALDSON

MAY 7, 2014

US DISTRICT COURTHOUSE
DISTRICT OF MASSACHUSETTS
1 COURTHOUSE WAY
BOSTON, MA 02210

RE: SECURITIES AND EXCHANGE COMMISSION

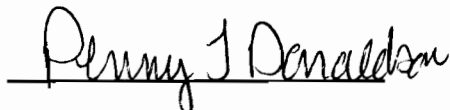
VS.

**JAMES M MERRILL, CARLOS N WANZELER, STEVEN M LABRIOLA, JOSEPH H CRAFT,
SANDERLEY RODRIGUES DE VASCONCELOS, SANTIAGO DE LA ROSA, RANDY N
CROSBY AND FAITH R SLOAN
AND
TELEXFREE, INC AND TELEXFREE, LLC**

CASE NO.: 14-11858-DJC

TRANSMITTED HERE WITH PLEASE FIND AN ANSWER OF TRUSTEE – RBS CITIZENS,
N.A., FOR FILING IN THE ABOVE-REFERENCED MATTER. THANK YOU FOR YOUR
ATTENTION TO THIS MATTER.

RBS CITIZENS BANK, N.A.

BY: 

PENNY J DONALDSON
IT'S AUTHORIZED REPRESENTATIVE

**CC: FRANK HUNTINGTON, SENIOR TRIAL COUNSEL
BOSTON REGIONAL OFFICE
33 ARCH ST., 23RD FL
BOSTON MA 02110-1424**